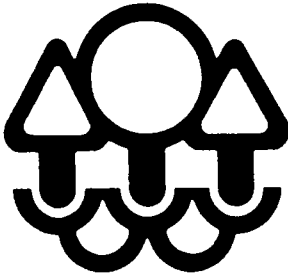




347813



Minnesota Pollution Control Agency

April 27, 1988

Mr. Dennis Thorson
AFC, Inc.
Highway 52 South
Chatfield, Minnesota 55923

Dear Mr. Thorson:

Re: Disposal Options for the Seventy-Five Drums of Styrene Contaminated Soil

Thank you for submitting on March 17, 1988, Twin City Testing's report concerning the styrene spill your company had back in December 1987. Minnesota Pollution Control Agency (MPCA) staff reviewed the report and determined that both the soil in the seventy-five drums and the soil remaining in ground near the spill area would not be classified as a hazardous waste under the Minnesota Hazardous Waste Rules.

As a non-hazardous waste, the MPCA recommends the following disposal options for the seventy-five drums of contaminated soil:

1. The first choice for disposal would be incineration at a local asphalt plant. The MPCA strongly encourages AFC, Inc. to pursue this disposal method for the 75 drums of contaminated soil.

As we discussed earlier on the telephone, AFC, Inc. should attempt to filter or pump out as much of the free standing styrene liquid from each drum as is possible prior to transporting the drums to an asphalt plant. You indicated on the telephone that the company would attempt to reuse the filtered styrene liquid.

2. A second option is disposal at a sanitary landfill or a non-hazardous industrial landfill. Prior to disposal of an industrial waste in a Minnesota sanitary landfill, a co-disposal application must be filled out and submitted for review to the MPCA. If the company chooses this option, let me know and I'll mail you a copy of the co-disposal application form. At the present moment there are no non-hazardous industrial landfills located in Minnesota and we cannot guarantee that any of Minnesota's sanitary landfills will accept the 75 drums of contaminated soil.

Phone: _____

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Mr. Dennis Thorson
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3. The third and least preferred option would be for AFC, Inc. to land apply the styrene contaminated soil at a site approved by the MPCA. In order to accomplish this last option, AFC, Inc. must choose a suitable site over which they have legal control and submit for MPCA approval a land application plan describing the location of the site, the surrounding neighborhood, the soil type, the method in which the company intends to land apply the contaminated soil, and the type of degradation monitoring plan to be used.

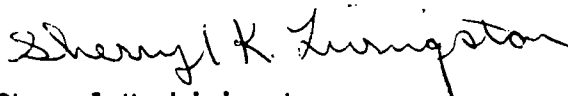
No matter what option is chosen AFC must file a waste management plan to the MPCA Director for review and approval.

Please contact me at (612) 296-7280 by May 15, 1988, to let me know which disposal method AFC, Inc. has chosen to use. If the company were to choose land treatment of the soil, a meeting with appropriate MPCA and company staff should be arranged.

As for the soil remaining in the ground below the excavated hole, MPCA staff recommends that the company leave the soil where it is. Based on Twin City Testing's analysis, it does not appear that the styrene concentration in the soil is high enough to warrant further excavation.

The MPCA appreciates AFC, Inc. conscientious effort to properly handle the Styrene split material. If you have any additional questions, please feel free to contact me at (612) 296-7280.

Sincerely,



Sherryl K. Livingston
Hazardous Waste Enforcement Unit
Hazardous Waste Section
Hazardous Waste Division

SKL:kh